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DATE : November 8, 1979

TO : Ken Hunich

FROM : Pete Henault *Pete Henault*

SUBJECT : EMERGENCY OPERATIONS MANUAL (EOM) REVISIONS

In our review of the EOM, we have concentrated on Appendix H, Oil/PCB. Our only comment concerning the rest of the manual relates to Appendix M, Organizational Charts. Some of these are out of date.

#### Oil Spills

Our main concern stems from findings by the EPA that at least 38 per cent of the 35,000,000 mineral oil transformers now in service in this country contain between 50 and 500 ppm PCB. The EPA has, therefore, reclassified all transformers formerly considered non-PCB transformers as "PCB contaminated", unless proven otherwise. Therefore, any oil spilled from a transformer, even if that transformer is labeled "non-PCB", must be cleaned up and disposed of in a manner consistent with departmental procedures for handling PCB spills.

As currently organized and presented, Appendix H does not clearly spell out how to respond to an oil spill, other than to notify certain people. The excerpt from the Oil Spill Prevention and Control Report (Pages 2-5), while responsive to the need to prevent an oil spill, does not indicate what to do when one occurs. This is clearly the purpose of the EOM, to tell the parties involved in a concise, step-by-step manner, how to effectively respond. We recommend that Pages 2-5 be deleted and replaced with precise, effective control measures for each type of spill. Types of spills would include:

- . Transformer oil spills (treat as PCB's).
- . Other oil spills.
- . Spills near water (e.g., Skagit, Boundary, Lake Union, Duwamish substation).
- . Spills on land.

Complementary control measures would explain the use and locations of "Sorb-Oil" equipment for spills into or near water, locations of barrels, containers, hand pumps, shovels, gloves, etc., for removal, handling and storing spilled materials. More precise information on control measures can be found in EPS's Region X Oil Spill Contingency Plan, available in the OEA library.

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We also recommend that the Oil Spill Prevention, Control and Counter-Measure (SPCC) Plan be updated (last revised in 1977). The SPCC Plan includes quite a number of recommended Action Items which presumably have been effected. We note the need for several additional Action Items at this time, including:

- . Installation of oil containment sumps beneath transformers Duwamish substation. The transformers (PCB contaminated) now sit on very permeable, gravelly soil adjacent to the Duwamish River.
- . Convert all automatic sump pumps to manual control with clearly established monitoring assignments.
- . Divert drainage from step-up transformer areas at Ross, Gorge, Diablo and Boundary to catchment basins with manual pumps and drainage valves.
- . Provide "Sorb-Oil" booms at Cedar Falls powerhouse.

#### PCB Spills

Pages 7-10 of Appendix H do a good job of describing the proper procedures. It should be noted at the top of Page 7, however, that leaks from non-PCB transformers must be handled in the same manner as PCB transformers. Also, on Page 9, under E.1., the paragraph on reusable PCB should be deleted. All references to "the disposal site" under part E should be changed to "the temporary PCB storage shed at SSC".

Under F, Storage of PCB, paragraph 1, first sentence, insert "the temporary PCB storage shed at" before "the 4th Avenue South yard".

Under F.3., replace "well ventilated area" with "temporary PCB storage shed". Under IV, Recording, add "and the Director of Operations" after the second sentence.

If you have any questions about our comments, please call Bill Riley at x3568.

WR:js

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